

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Jessica M. Heinz, Esq,**  
**CIPRIANI & WERNER, P.C.**  
**450 Sentry Parkway, Suite 200**  
**Blue Bell, Pennsylvania 19422**  
*Attorneys for Defendants Aurobindo Pharma, Ltd., Aurobindo Pharma USA, Inc., and*  
*Aurolife Pharma, LLC (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Steve Lucas, on May 18, 2021 and May 19, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Cipriani & Werner, P.C., 450 Sentry Parkway, Suite 200, Blue Bell, Pennsylvania 19422, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEY FOR PLAINTIFFS:**

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

April 29, 2021

By: /s/Marlene Goldenberg

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**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Steve Lucas.
2. The complete production of Steve Lucas's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/Marlene Goldenberg

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